

Steven T. Wax, OSB No. 85012
Federal Public Defender
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524
Email: steve_wax@fd.org

Lawrence Matasar, OSB No. 74209
621 SW Morrison Street, Suite #1025
Portland, OR 97205
Tel: (503) 222-9830
Email: larry@pdxlaw.com

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIROUZ SEDAGHATY,

Defendant.

CR 05-60008

**MOTION REGARDING DEFENSE
ACCESS TO CLASSIFIED
DISCOVERY**

Defendant, Pirouz Sedaghaty, through his attorneys, Lawrence Matasar, and Federal Public Defender Steven T. Wax, hereby moves this Court for an order:

1. directing the government to provide him a more detailed pleading regarding classified discovery than was filed on September 5, 2008;

2. permitting him to participate in the Classified Information Protection Act, 18 U.S.C. App. 3 (CIPA) Section 4 process by either:

- a. permitting him to review the classified submission under appropriate security clearances and protective orders; or
- b. file an *ex parte* pleading regarding the CIPA Section 4 process.

This motion is supported by an accompanying memorandum of Law

RESPECTFULLY SUBMITTED this 10th day of October, 2008.

/s/ Steven T. Wax

Steven T. Wax
Federal Public Defender

/s/ Lawrence W. Matasar

Lawrence W. Matasar